

UNIFIED DATA PROCESSING POLICY AND PRIVACY NOTICE

on the processing of personal data relating to attitude surveys, the organisation of a citizens' assembly, applications, contact-keeping, newsletter distribution, research data processing and the handover of gift vouchers, as well as the organisation of the Budapest site visit of the Cooling Havens project

Effective from: 20 July 2026

Controller 1	Mayor's Office of the 18th District of Budapest (Pestszentlőrinc-Pestszentimre)
Controller 2	InnoK Tudásmenedzsment Intézet Nonprofit Kft.
Type of document	Unified data processing policy and data subject privacy notice
Entry into force	20 July 2026

Table of Contents

1. Purpose of the notice and policy	14. Data minimisation and necessity
2. Details of the joint controllers	15. Data transfers, recipients, processors
3. The essence of the joint controllership	16. Transfer of data to a third country
4. Overview of the processing activities	17. Data security measures
5. Processing relating to the attitude survey and questionnaire-based research	18. Rights of the data subjects
6. Research data processing plan	19. Submission of data subject requests
7. Processing relating to application and registration for the citizens' assembly	20. Remedies
8. Processing relating to the formation of the pool of participants	21. Consent declarations
9. Processing relating to contact-keeping	22. Final provisions
10. Processing relating to catering arrangements, food intolerances and special diets	23. Finalised data
11. Processing relating to newsletter distribution	24. Processing relating to the organisation of the Budapest site visit of the Cooling Havens project
12. Processing relating to the handover of gift vouchers	25. Processing relating to the making and use of photo, audio and video recordings
13. Sample acknowledgement of receipt for the handover of a gift voucher	

1. Purpose of the notice and policy

Mayor's Office of the 18th District of Budapest (Pestszentlőrinc-Pestszentimre) and InnoK Tudásmenedzsment Intézet Nonprofit Kft., as joint controllers, provide information to the data subjects in this data processing policy and notice about the processing of personal data relating to attitude surveys, questionnaire-based research, the organisation of a citizens' assembly, applications, contact-keeping, newsletter distribution, research data processing, catering arrangements, as well as the preparation, organisation and conduct of the Budapest site visit of the Cooling Havens project and the handover of gift vouchers.

The purpose of the document is to provide the data subjects with clear and easily understandable information about the purposes, legal bases, categories of personal data and duration of the processing carried out by the controllers, as well as the rights available to them. The document also contains internal policy provisions for the organisation, documentation and monitoring of the data processing activities.

In the course of the processing, the controllers act in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, i.e. the General Data Protection Regulation (GDPR), the legislation on the right to informational self-determination and freedom of information, the accounting rules, and the provisions of Act CXIX of 1995.

2. Details of the joint controllers

2.1. Controller 1

Name	Mayor's Office of the 18th District of Budapest (Pestszentlőrinc-Pestszentimre)
Registered seat	1184 Budapest, Üllői út 400.
Data protection officer	dr. András Jóri
Contact details of the data protection officer	bp18@dataprotection.eu

2.2. Controller 2

Name	InnoK Tudásmenedzsment Intézet Nonprofit Kft.
Registered seat	1181 Budapest, Üllői út 286. fsz. 10.
Contact details of the data protection officer	info@urbanlab.hu

3. The essence of the joint controllership

Mayor's Office of the 18th District of Budapest (Pestszentlőrinc-Pestszentimre) and InnoK Tudásmenedzsment Intézet Nonprofit Kft. act as joint controllers with respect to the processing purposes defined in this notice, as they jointly determine the purposes and essential means of the processing in relation to the attitude survey, the organisation of the citizens' assembly, the related communication, and the administration connected to the event.

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The joint controllers conclude a joint controllership arrangement pursuant to Article 26 of the GDPR. In the arrangement, they determine in a transparent manner their respective tasks and responsibilities relating to the processing, in particular with regard to the following:

- ensuring data subject rights;
- data protection information;

- rectification of data;
- data security measures;
- handling data processing requests;
- handling data protection incidents;
- erasure, anonymisation and retention of data;
- receipt and processing of restriction requests, objections and complaints;
- use of processors and contributors;
- keeping data processing documentation.

The conclusion of the joint controllership arrangement is a precondition for commencing the processing activities under this notice. The essence of the joint controllership arrangement must be made available to the data subjects.

A data subject may submit a request concerning the processing of their personal data to the data protection officer of either joint controller.

Definitions

For the purposes of this notice:

Personal data: any information relating to an identified or identifiable natural person.

Data subject: the natural person whose personal data are processed by the controllers, in particular a person participating in the attitude survey, a person applying for or participating in the citizens' assembly, or a person subscribing to the newsletter.

Processing: any operation performed on personal data, in particular the collection, recording, organisation, storage, use, transfer, erasure or destruction of the data.

Citizens' assembly: a participatory event involving the population, data subjects and local stakeholders of the district, the purpose of which is the joint discussion of local matters, developments, problems and possible solutions.

Gift voucher: a voucher or other benefit of monetary value handed over in connection with participation in the citizens' assembly, under the conditions determined by the controllers.

Cooling Havens project: a project implemented within the framework of international or professional cooperation, in connection with which the controllers may carry out professional programmes, meetings, site visits and related organisational tasks.

Site visit: a professional visit related to the Cooling Havens project, taking place in Budapest, which may include the invitation and registration of participants, the coordination of their participation in the programme, the verification of their on-site presence, as well as travel, catering, accessibility and contact-keeping organisational tasks.

4. Overview of the processing activities

1. organisation of the attitude survey and questionnaire-based research;
2. application and registration for the citizens' assembly;
3. formation of the pool of participants;
4. keeping contact with applicants and participants;
5. catering arrangements, handling of food intolerances and special diets;
6. processing of data relating to previous participation;
7. newsletter distribution;

8. documentation and accounting of the handover of gift vouchers;
9. research data processing pursuant to the research data processing plan;
10. handling of data subject requests.
11. preparation, organisation and conduct of the Budapest site visit of the Cooling Havens project and the related contact-keeping.

5. Processing relating to the attitude survey and questionnaire-based research

5.1. Purpose of the processing

The purpose of the processing is to enable the controllers to carry out an attitude survey, questionnaire-based research and participatory research activity covering the 18th District of Budapest, in the framework of which they involve the population and data subjects of the district in the sociological survey to the widest possible extent.

The aim of the research is to involve the population and data subjects of the district, to explore local opinions, attitudes, needs, problems and development proposals, and to use the results in the development of the district, in local decision preparation and in supporting participatory processes.

5.2. Legal basis of the processing

The legal basis of the processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR.

5.3. Categories of personal data processed

- surname;
- first name;
- e-mail address;
- answers voluntarily provided in the questionnaire;
- the fact of participation in the research;
- technical or administrative data necessary for conducting the research.

5.4. Source of the data

The source of the data is the data subject.

5.5. Duration of the processing

The controllers process the data for the period necessary to conduct, process and close the research. After the research is closed, data suitable for identification are erased or anonymised, unless further processing of the data is justified by law or another processing purpose and the data subject has consented thereto.

6. Research data processing plan

In view of the fact that the attitude survey, questionnaire-based research, the survey related to the citizens' assembly and the participatory research activity set out in this notice qualify as research data processing falling within the scope of Act CXIX of 1995, the controllers draw up a separate research data processing plan before commencing the research.

The research data processing plan contains in particular:

- the research authorisation;
- the purpose of the research;
- the methodology of the research;
- the categories of personal data to be processed;
- the source of the data;

- the process of data collection;
- the criteria for selecting participants;
- the duration of the processing;
- the method of anonymisation or pseudonymisation;
- the circle of persons having access to the data;
- the practical safeguards for data subject rights;
- the technical and organisational measures ensuring data protection.

Drawing up the research data processing plan is a precondition for commencing the research. The controllers retain the research data processing plan until the termination of the processing, in order to demonstrate the lawfulness of the processing and to ensure that it can be verified.

7. Processing relating to application and registration for the citizens' assembly

7.1. Purpose of the processing

The purpose of the processing is the organisation of the citizens' assembly, the receipt and processing of applications, the registration of applicants, the examination of participation eligibility and connection to the district, as well as the performance of the organisational tasks necessary for the preparation, conduct and closing of the citizens' assembly.

The purpose of the processing is furthermore to enable the controllers, taking into account the socio-demographic, territorial and participation characteristics of the applicants, to ensure the formation of a diverse pool of participants for the citizens' assembly that represents the population and data subjects of the district as well as possible.

7.2. Legal basis of the processing

The legal basis of the processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR.

7.3. Categories of personal data processed

- surname;
- first name;
- gender;
- age group;
- district area of residence;
- postal code;
- street;
- house number;
- an indication of how long the data subject has lived in the district;
- an indication of whether the data subject plans to move out of the district in the near future;
- level of education;
- other education;
- the fact of previous participation in a citizens' assembly or focus group research;
- an indication of previous participation in a citizens' assembly, in particular:
27 September 2025; 11–12 October 2025; 16–17 May 2026;
- an indication of whether the data subject has previously participated in focus group research;
- other data relating to previous participation;
- e-mail address;
- re-entry of the e-mail address for verification purposes;
- telephone number;
- an indication of where the data subject heard about the citizens' assembly;
- the name of a referring acquaintance or friend, if the data subject provides such data;
- the name of the school, if the data subject heard about the citizens' assembly at the school;

- preferred contact channel.

7.4. Data relating to connection to the district

The controllers may process in particular an indication that the data subject:

- works in the district;
- studies in the district;
- usually shops in the district;
- handles their official affairs in the district;
- is a member of a local civil society organisation;
- is a member of a local community club;
- is a member of a local sports organisation;
- is connected to the district in some other way.

7.5. Data relating to previous participation

The purpose of the processing is to establish whether the data subject has previously participated in a citizens' assembly or focus group research organised in the district. This information may be processed for the purpose of forming the pool of participants, evaluating participatory processes and examining the composition of the applicants.

Legal basis of the processing

The legal basis of the processing is consent pursuant to Article 6(1)(a) of the GDPR.

Categories of personal data processed

- the fact of whether the data subject has previously participated in a citizens' assembly;
- the date of the previous citizens' assembly, in particular:
 - **27 September 2025; 11–12 October 2025; 16–17 May 2026;**
- the fact of whether the data subject has previously participated in focus group research;
- other data relating to previous participation.

Duration of the processing

The controllers process the data for the period necessary to form the pool of participants of the citizens' assembly and to evaluate the participatory process, for no longer than 12 months following the closing of the citizens' assembly.

7.6. Mandatory and optional data

Providing the data marked with an asterisk on the application form is a condition for submitting the application. In the absence of such data, the controllers are unable to process the application or to ensure the contact-keeping necessary for organising the citizens' assembly.

Completing the optional fields is voluntary. The failure to provide optional data does not in itself result in the exclusion of the application, unless the given data is indispensable for verifying the participation conditions or for conducting the event.

7.7. Source of the data

The source of the data is the data subject. If the data subject provides the name of an acquaintance or friend as a referrer, the source of that data is likewise the data subject. It is the data subject's responsibility to provide a third party's name only lawfully and with the knowledge of the person concerned.

7.8. Duration of the processing

The controllers process the personal data relating to application, registration and participation organisation for the citizens' assembly for the period necessary for the preparation, conduct and closing of the citizens' assembly, as well as for any subsequent administration.

The controllers process the registration and contact data for no longer than 12 months following the closing of the citizens' assembly, after which they erase or anonymise them, unless further processing of the data is necessary for the fulfilment of a legal obligation or the enforcement of a legal claim.

8. Processing relating to the formation of the pool of participants

8.1. Purpose of the processing

Applying for the citizens' assembly does not automatically guarantee participation. The controllers form the pool of participants on the basis of the applicants' data, so that the population and data subjects of the district are represented as diversely as possible at the event.

During the selection, the following may in particular be taken into account:

- age group;
- gender;
- district area of residence;
- connection to the district;
- previous participation;
- level of education;
- other relevant socio-demographic aspect.

8.2. Legal basis of the processing

The legal basis of the processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR.

8.3. Automated decision-making

The controllers do not use solely automated decision-making that would produce legal effects concerning the data subject or similarly significantly affect them.

The applicants' data may be used to establish statistical, organisational and selection criteria; however, during the selection process a human decision and organiser's discretion take place.

9. Processing relating to contact-keeping

9.1. Purpose of the processing

The purpose of the processing is to enable the controllers to keep in contact with the applicants and participants, to send information about the status of the application, the outcome of the selection, the date, venue, programme and participation conditions of the citizens' assembly, as well as other information relating to the conduct of the event.

9.2. Legal basis of the processing

The legal basis of the processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR.

9.3. Categories of personal data processed

- surname;
- first name;
- e-mail address;

- telephone number;
- preferred contact channel;
- messages and administrative data arising in the course of contact-keeping.

9.4. Duration of the processing

The controllers process the contact data for the period necessary for organising and closing the citizens' assembly, for no longer than 12 months following the closing of the citizens' assembly.

10. Processing relating to catering arrangements, food intolerances and special diets

10.1. Purpose of the processing

The purpose of the processing is to enable the controllers to provide appropriate catering for the data subjects participating in the citizens' assembly, taking into account any food intolerance, food allergy or special diet.

10.2. Legal basis of the processing

Providing data relating to food intolerance, food allergy or special diet is voluntary.

Since data relating to food intolerance or food allergy may indicate health data, the legal basis of the processing is consent pursuant to Article 6(1)(a) of the GDPR and explicit consent pursuant to Article 9(2)(a) of the GDPR.

10.3. Categories of personal data processed

- an indication of whether the data subject has a food intolerance or follows a special diet;
- the type of food intolerance or special diet;
- other information relating to food intolerance or special diet.

10.4. Duration of the processing

The controllers process the data relating to food intolerance or special diet solely for the period necessary for catering arrangements and the conduct of the event, for no longer than 12 months following the closing of the citizens' assembly.

10.5. Consent text

"I expressly consent to the controllers processing the data I have provided regarding food intolerance, food allergy or special diet for the purpose of catering arrangements for the citizens' assembly. I acknowledge that providing this data is voluntary and that the controllers process it solely for the period necessary for conducting the event."

11. Processing relating to newsletter distribution

11.1. Purpose of the processing

The purpose of the processing is to enable the controllers to inform, by e-mail, the data subjects who voluntarily subscribe about the results of the research, information relating to the citizens' assembly, participatory processes, the activities of the municipality and events of the district.

11.2. Legal basis of the processing

The legal basis of the processing is consent pursuant to Article 6(1)(a) of the GDPR.

11.3. Categories of personal data processed

- surname;
- first name;
- e-mail address;
- the fact and date of the newsletter subscription;
- the fact and date of unsubscription.

11.4. Duration of the processing

The processing lasts until the data subject withdraws their consent, unsubscribes, objects, or until the newsletter service is terminated.

The controllers treat unsubscription from the newsletter as a withdrawal of consent and as an objection to the processing, and erase the data subject's data processed for newsletter distribution

11.5. Newsletter consent text

"I consent to the controllers sending me a newsletter by e-mail about the results of the research, information relating to the citizens' assembly, participatory processes, and events of the district. I acknowledge that I may withdraw my consent at any time."

12. Processing relating to the handover of gift vouchers

12.1. Purpose of the processing

If participants in the citizens' assembly receive a gift voucher, InnoK Tudásmenedzsment Intézet Nonprofit Kft. processes personal data for the purpose of documenting the handover of the gift voucher, verifying the handover, preventing possible abuse, and fulfilling accounting and other statutory accounting obligations.

The purpose of the processing is to verify that the gift voucher was received by the participant entitled to it, and to ensure that a gift voucher is handed over to a participant only in accordance with the organisational and accounting rules.

The gift voucher is a benefit related to participation in the citizens' assembly, the issuer, type and nominal value of which may vary. The issuer, type, serial number or unique identifier, quantity and nominal value of the gift voucher actually handed over to a given participant are set out in the acknowledgement of receipt.

12.2. Legal basis of the processing

The legal basis of the processing relating to the conduct of the handover of the gift voucher is consent pursuant to Article 6(1)(a) of the GDPR.

The legal basis of the processing relating to the issuance, retention and accounting of the document verifying the handover of the gift voucher is compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR.

The basis of the legal obligation is constituted in particular by the statutory provisions on the issuance and retention of accounting documents.

12.3. Categories of personal data processed

In connection with the handover of the gift voucher, the controllers process or may process the following personal data:

- recipient's surname;
- recipient's first name;
- recipient's address;
- the fact of receipt of the gift voucher;
- the date of receipt of the gift voucher;

- the designation of the gift voucher;
- the issuer or type of the gift voucher;
- the nominal value of the gift voucher;
- the quantity of the gift voucher;
- the serial number or unique identifier of the gift voucher, if available;
- the legal title of the handover;
- the recipient's signature;
- the name and signature of the person carrying out the handover.

12.4. Verification of identity document

When handing over the gift voucher, the controllers are entitled to verify the recipient's identity by requesting the presentation of an identity document, in order to ensure that the gift voucher is received by the person entitled to it.

The controllers do not record the number of the identity document and do not make a copy of the document.

The number of an identity document may be recorded only if this is expressly required by law, a grant accounting requirement, a taxation or accounting obligation, or another previously demonstrated and documented obligation. In such a case, the controllers provide the data subjects with separate prior information about the purpose, legal basis and duration of the processing and about the data subject rights.

12.5. Duration of the processing

The controllers retain the data relating to the handover of the gift voucher that form part of an accounting document until the statutory deadline for retaining accounting documents.

The controllers process the data relating to the organisation of the handover of the gift voucher that do not form part of an accounting document for no longer than 12 months after the closing of the event and the settlement of the handover of the gift vouchers.

12.6. Acknowledgement of receipt declaration

"I acknowledge that if I receive a gift voucher, the controllers process the personal data appearing on the acknowledgement of receipt for the purpose of documenting the handover of the gift voucher, verifying the handover, preventing possible abuse, and fulfilling accounting and statutory obligations. I acknowledge that my identity may be verified upon handover by the presentation of an identity document, but the number of the document is not recorded and no copy of the document is made."

13. Sample acknowledgement of receipt for the handover of a gift voucher

ACKNOWLEDGEMENT OF RECEIPT FOR THE HANDOVER OF A GIFT VOUCHER

Designation of the document	[to be completed at handover]
Serial number of the document	[to be completed at handover]
Name of the handing-over organisation	InnoK Tudásmenedzsment Intézet Nonprofit Kft.
Registered seat	1181 Budapest, Üllői út 286. fsz. 10.
Tax number	[to be completed at handover]
Name of the person carrying out the handover	[to be completed at handover]
Name of the recipient	[to be completed at handover]
Address of the recipient	[to be completed at handover]
Designation of the gift voucher handed over	gift voucher related to participation in the citizens' assembly
Issuer / type of the voucher	[to be completed at handover]
Serial number or identifier of the voucher	[to be completed at handover, if any]
Quantity	[to be completed at handover]
Nominal value	[to be completed at handover] HUF
Total value	[to be completed at handover] HUF
Legal title of the handover	gift voucher related to participation in the citizens' assembly / participation compensation
Signature of the recipient	[to be completed at handover]

I, the undersigned recipient, declare that I have received the gift voucher indicated above on today's date.

I acknowledge that InnoK Tudásmenedzsment Intézet Nonprofit Kft. processes my personal data relating to the receipt of the gift voucher for the purpose of documenting the handover, verifying the handover, preventing possible abuse, and fulfilling accounting and statutory obligations.

I acknowledge that my identity may be verified upon handover by the presentation of an identity document, but the number of the document is not recorded and no copy of the document is made.

Dated: Budapest, [day] [month] 2026

Recipient's signature: _____

Handing-over party's signature: _____

14. Data minimisation and necessity

The controllers process only such personal data as are necessary and proportionate for achieving the given processing purpose.

The controllers in particular endeavour to process a document number, a copy of a document, health data or other data requiring enhanced protection only where this is strictly necessary and the processing has an appropriate legal basis.

The controllers determine the range of data necessary for organising the citizens' assembly in such a way that it is suitable for processing the application, for contact-keeping, for forming the pool of participants, for conducting the event and for accounting for any benefits, but does not result in unjustified or excessive processing.

15. Data transfers, recipients, processors

The controllers make the personal data accessible only to the persons and organisations necessary for achieving the processing purposes.

The personal data may be accessed in particular by:

- the designated staff of the controllers;
- persons with appropriate authorisation who participate in organising the citizens' assembly;
- persons or organisations performing bookkeeping, accounting or financial tasks, solely with regard to the data necessary for accounting for the gift voucher;
- the service provider participating in the catering arrangements, solely with regard to the data necessary for providing the catering;
- authorities acting on the basis of law, where the data transfer is necessary for the fulfilment of a legal obligation.

The controllers use a processor only if the processor provides appropriate data protection and data security guarantees and the controllers conclude a processing agreement with it in accordance with the GDPR.

16. Transfer of data to a third country

The controllers do not transfer personal data to a third country or to an international organisation.

In the course of keeping contact with the foreign project partners participating in the Cooling Havens project, access to or transfer of the data may take place solely to the extent necessary for organising the project and the site visit. If this were to involve a transfer of data to a third country, the controllers provide the data subjects with separate prior information and ensure the appropriate guarantees under the GDPR.

If, in the future, a service provider is used that involves a transfer of data to a third country, the controllers provide the data subjects with prior information thereon and ensure the appropriate guarantees under the GDPR.

17. Data security measures

The controllers apply appropriate technical and organisational measures to ensure the security of the personal data.

The controllers ensure in particular that:

- only authorised persons may access the personal data;
- the data are processed in a purpose-bound manner;
- access is restricted and verifiable;
- paper-based documents are stored in a closed place inaccessible to unauthorised persons;
- electronic data are protected by appropriate access management, password protection or other security solutions;
- the data are erased, anonymised or destroyed upon expiry of the processing period;
- data relating to food intolerance or special diet may be accessed only by those who strictly need it for catering arrangements;
- the acknowledgements of receipt for the gift vouchers are stored separately, securely and in a verifiable manner.

18. Rights of the data subjects

Under the GDPR, the data subject is entitled to the following rights:

18.1. Right of access

The data subject is entitled to request information about whether the controllers process their personal data and, if so, is entitled to learn the main circumstances of the processing.

18.2. Right to rectification

The data subject may request the rectification of inaccurate personal data relating to them, or the completion of incomplete personal data.

18.3. Right to erasure

The data subject may request the erasure of their personal data if the purpose of the processing has ceased, the data subject has withdrawn their consent, the processing is unlawful, or erasure is required by law. The right to erasure does not apply where the processing is necessary for compliance with a legal obligation, the retention of an accounting document, or the establishment, exercise or defence of a legal claim.

18.4. Right to restriction of processing

The data subject may request the restriction of processing if they contest the accuracy of the data, the processing is unlawful but the data subject does not request erasure, the controllers no longer need the data but the data subject requests their retention for the enforcement of a legal claim, or the data subject has objected to the processing.

18.5. Right to data portability

In the case of processing based on consent and carried out by automated means, the data subject is entitled to receive the personal data relating to them in a structured, commonly used, machine-readable format, and to request their transmission to another controller.

18.6. Right to object

The data subject is entitled to object to the processing of their personal data where the processing is based on the performance of a task carried out in the public interest, the exercise of official authority, or a legitimate interest.

18.7. Withdrawal of consent

Where the processing is based on consent, the data subject is entitled to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal.

19. Submission of data subject requests

The data subject may submit their request relating to the processing through any of the following contact details:

- bp18@dataprotection.eu
- info@urbanlab.hu

The controllers examine and respond to data subject requests within the time limit specified in the GDPR.

20. Remedies

If the data subject considers that an infringement has occurred in the course of the processing of their personal data, or that there is a direct risk thereof, they are entitled to contact the data protection officers of the controllers.

The data subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information.

Authority	National Authority for Data Protection and Freedom of Information
Postal address	1363 Budapest, PO Box 9.
Address	1055 Budapest, Falk Miksa utca 9-11.
E-mail	ugyfelszolgalat@naih.hu
Telephone	+36 1 391 1400
Website	www.naih.hu

The data subject is also entitled to bring an action before a court. At the data subject's choice, the action may also be brought before the regional court competent for their place of residence or place of stay.

21. Consent declarations

21.1. Registration processing consent

"I consent to Mayor's Office of the 18th District of Budapest (Pestszentlőrinc-Pestszentimre) and InnoK Tudásmenedzsment Intézet Nonprofit Kft. processing the personal data I have provided for the purpose of processing my application for the citizens' assembly, forming the pool of participants, contact-keeping and organising the event. I declare that I have read and acknowledged the content of the data processing notice."

21.2. Separate consent for catering arrangements

"I expressly consent to the controllers processing the data I have provided regarding food intolerance, food allergy or special diet for the purpose of catering arrangements for the citizens' assembly. I acknowledge that providing this data is voluntary and that the controllers process it solely for the period necessary for conducting the event."

21.3. Newsletter consent

"I consent to the controllers sending me a newsletter by e-mail about the results of the research, information relating to the citizens' assembly, participatory processes, and events of the district. I acknowledge that I may withdraw my consent at any time."

21.4. Declaration relating to the receipt of a gift voucher

"I acknowledge that if I receive a gift voucher, the controllers process the personal data appearing on the acknowledgement of receipt for the purpose of documenting the handover of the gift voucher, verifying the handover, preventing possible abuse, and fulfilling accounting and statutory obligations. I acknowledge that my identity may be verified upon handover by the presentation of an identity document, but the number of the document is not recorded and no copy of the document is made."

21.5. Consent relating to the Budapest site visit of the Cooling Havens project

"I consent to the controllers processing the personal data I have provided for the purpose of my application for, and participation in, the Budapest site visit related to the Cooling Havens project, contact-keeping with me, and the preparation, organisation, conduct and subsequent administration of the programme. I acknowledge that providing data relating to food intolerance, special diet or accessibility needs is voluntary, and that such data are processed solely for the period necessary for conducting the site visit."

21.6. Consent relating to the making and use of photo, audio and video recordings

"I consent to the controllers making photo, audio and video recordings of me, recording what I say, and using the materials thus created for educational, scientific, research, professional documentation and limited

promotional purposes, in accordance with the data processing notice, during my cooperation with them, the citizens' assembly, the Budapest site visit of the Cooling Havens project, or the professional, research and participatory events related thereto. I acknowledge that my face and voice may be recognisable in the recordings, whereas my other personal data may appear only on the basis of my separate consent. I further acknowledge that I may withdraw my consent at any time, but the withdrawal does not affect the lawfulness of the processing prior to the withdrawal."

22. Processing relating to the organisation of the Budapest site visit of the Cooling Havens project

22.1. Purpose of the processing

The purpose of the processing is the preparation, organisation and conduct of the site visit related to the Cooling Havens project, taking place in Budapest, including in particular the invitation and registration of participants, the management of participation eligibility and headcount, the coordination of the professional programme and venues, contact-keeping with participants and contributors, and the handling of catering, accessibility needs, admission, attendance sheets, programme changes and subsequent administration.

The purpose of the processing is furthermore the professional documentation of the project, the verification of the performance of the organisational tasks, and ensuring operational cooperation with the project partners, speakers, venues and service providers.

22.2. Legal basis of the processing

The legal basis of the processing relating to application for the site visit, participation organisation and contact-keeping is consent pursuant to Article 6(1)(a) of the GDPR.

Where the processing is necessary for the fulfilment of a project, grant, accounting or statutory accounting obligation, the legal basis of the processing is compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR.

Providing information relating to food intolerance, food allergy, an accessibility need indicating a state of health, or other special data is voluntary; where such data are processed, the legal basis of the processing is consent pursuant to Article 6(1)(a) of the GDPR and explicit consent pursuant to Article 9(2)(a) of the GDPR.

22.3. Categories of personal data processed

In organising the Budapest site visit of the Cooling Havens project, the controllers may process the following personal data:

- ✓ surname;
- ✓ first name;
- ✓ name of the organisation or institution;
- ✓ position or professional role;
- ✓ e-mail address;
- ✓ telephone number;
- ✓ country, city or organisational affiliation;
- ✓ participation status, feedback, date of registration;
- ✓ information relating to participation in individual programme elements of the site visit;
- ✓ data appearing on the attendance sheet, in particular name, organisation, signature, date and venue of participation;
- ✓ data necessary for the organisation relating to travel, arrival, departure or accommodation needs;

- ✓ catering preference, food intolerance, food allergy or special diet, if voluntarily provided by the data subject;
- ✓ accessibility or barrier-free needs, if voluntarily provided by the data subject;
- ✓ messages and administrative data arising in the course of contact-keeping;
- ✓ the fact of appearing in a photo, audio or video recording, solely where such processing takes place during the documentation of the site visit on the basis of separate information and an appropriate legal basis.

22.4. Source of the data

The source of the data is primarily the data subject. In the case of an organisational or partner invitation, the source of the data may also be the data subject's employer, delegating organisation, project partner, or the contact person participating in organising the site visit, provided that the data are transferred lawfully.

22.5. Duration of the processing

The controllers process the personal data relating to the organisation and conduct of the site visit for the period necessary for the preparation, conduct and closing of the programme, as well as for any subsequent administration and project accounting.

The registration, contact and attendance data may be processed for no longer than 12 months following the closing of the site visit, after which they are erased or anonymised, unless further processing of the data is necessary for the fulfilment of a statutory, grant or accounting obligation.

The controllers process the data relating to food intolerance, special diet or accessibility needs solely for the period necessary for conducting the site visit, and erase them at the latest within 30 days following the closing of the programme.

22.6. Automated decision-making and profiling

In organising the Budapest site visit of the Cooling Havens project, the controllers do not use solely automated decision-making within the meaning of the GDPR and do not carry out profiling.

23. Processing relating to the making and use of photo, audio and video recordings

23.1. Purpose of the processing

The purpose of the processing is to enable the controllers to make, record, store and use photo, audio and video recordings, interviews, conversations and other audiovisual content during the citizens' assembly, the Budapest site visit of the Cooling Havens project, or the professional, research or participatory events related thereto.

The purpose of the processing is in particular scientific processing, social research analysis, educational and professional presentation, presentations, case studies, project and event documentation, as well as the limited, non-commercial communication presentation of the organisations' activities.

The use may extend to appearance on the own communication and social media platforms of InnoK Tudásmenedzsment Intézet Nonprofit Kft., in particular on Facebook, Instagram, LinkedIn and YouTube, in the form of social media posts, short videos, reels or short films. The use does not extend to the sale of the materials to third parties, their independent commercial use, or their application for advertising purposes.

23.2. Legal basis of the processing

The legal basis for making, storing and using photo, audio and video recordings is consent pursuant to Article 6(1)(a) of the GDPR. If the recording or its content may also concern special data, the legal basis of the processing is explicit consent pursuant to Article 9(2)(a) of the GDPR.

The data subject's consent is voluntary. The refusal or withdrawal of consent may not in itself adversely affect the data subject's participation in the event; however, in that case the controllers do not make or use recognisable recordings of the data subject for the given purpose.

23.3. Categories of personal data processed

The controllers may process the following personal data:

- ✓ name;
- ✓ e-mail address;
- ✓ telephone number;
- ✓ address;
- ✓ the identifying data appearing in the consent declaration, in particular identity card number, place and date of birth, mother's name, where providing these is actually necessary for documenting the consent;
- ✓ the photo, audio and video recording made of the data subject;
- ✓ the data subject's image, voice, statement, opinion or communication made in an interview or conversation;
- ✓ information voluntarily provided or stated by the data subject, as well as content recorded in connection with participation in the event;
- ✓ the fact, date and documentation of the giving and withdrawal of consent and of any restriction on use.

23.4. Source of the data

The source of the data is the data subject, as well as the photo, audio or video recording made of them during the event. Content stated or provided by the data subject, or appearing in the recording, likewise originates from the data subject.

23.5. Duration of the processing

The controllers retain the recorded and stored photo, audio and video recordings, interviews and conversations for 1 year from the date of making them, after which they erase or anonymise them, unless the data subject gave consent for a shorter period, withdrew their consent, or further retention of the data is necessary for the enforcement of a legal claim, the fulfilment of a legal obligation, or on another appropriate legal basis.

The withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal. In the case of publicly published content, the controllers take reasonable measures following the withdrawal to remove it from the platforms managed by them or directly accessible to them.

23.6. Restrictions on use and identifiability

In using the recordings, the controllers endeavour to observe data minimisation and to ensure that the data subject's name, address or other direct identifying data do not appear, unless the data subject has given separate prior consent thereto or the display of the data is lawfully necessary.

The data subject's face and voice may appear in a recognisable manner in the recordings covered by the consent. If the data subject consents only to limited use, the controllers ensure that the use takes place within the framework defined in the consent.

23.7. Automated decision-making and profiling

In the processing relating to the making and use of photo, audio and video recordings, the controllers do not use solely automated decision-making within the meaning of the GDPR and do not carry out profiling.

24. Final provisions

This data processing notice and policy is applicable from 20 July 2026.

The precondition for commencing the processing activities under this notice is:

1. the drawing up and conclusion of the joint controllership arrangement pursuant to Article 26 of the GDPR;
2. the drawing up of the research data processing plan;
3. the finalisation of the data processing notice and making it available to the data subjects;
4. informing the persons involved in the data processing process about the provisions of this policy.

The controllers reserve the right to amend this notice in the event of a change in legislation, a modification of the data processing processes, the introduction of a new processing purpose, or other justified circumstances.

The controllers make the amended data processing notice available to the data subjects.

25. Finalised data

Date of entry into force	20 July 2026
Retention period of registration and contact data	12 months following the closing of the citizens' assembly.
Retention period of data relating to food intolerance, food allergy or special diet	12 months following the closing of the citizens' assembly.
Retention period of the organisational data of the gift voucher	12 months following the closing of the event and the settlement of the handover of the gift vouchers.
Handing-over organisation	InnoK Tudásmenedzsment Intézet Nonprofit Kft., 1181 Budapest, Üllői út 286. fsz. 10.
Type of gift voucher	A gift voucher related to participation in the citizens' assembly, handed over by InnoK Tudásmenedzsment Intézet Nonprofit Kft. to the participants meeting the participation conditions.
Nominal value of the gift voucher	Gift voucher of variable amount. The exact nominal value of the gift voucher handed over to a given participant is set out in the acknowledgement of receipt.
Issuer of the gift voucher	Variable issuer. The issuer or type of the gift voucher handed over to a given participant is set out in the acknowledgement of receipt.
Tax title of the gift voucher	To be recorded on the basis of the final position of the accountant or tax advisor.
Joint controllership arrangement	The joint controllers must draw up and conclude the joint controllership arrangement pursuant to Article 26 of the GDPR.
Research data processing plan	A separate research data processing plan must be drawn up on the basis of Act CXIX of 1995.